

## Center for Disability Advocacy Rights (CeDAR), Inc.

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December 16, 2019

## **MEMO ENDORSED**

Re: <u>Martinez v. Saul</u> 1:19-cy-06515-BCM

## Via ECF

Hon Barbara C. Moses United States Magistrate Judge Southern District of New York 500 Pearl Street New York, NY 10007

## Dear Judge Moses:

As the attorney for the above plaintiff in the above captioned case, I write to request approval of the proposed briefing schedule. This is plaintiff's first request for an extension of time and is made with the consent of, and in consultation with, opposing AUSA Joseph Pantoja.

I respectfully propose the following briefing schedule pursuant to your Honor's individual rules:

January 7, 2020	Plaintiff's settlement letter
February 6, 2020	Stipulation of Dismissal or No Settlement Joint Letter
March 9, 2020	Plaintiff's Motion for Judgment on the Pleadings
May 8, 2020	Defendant's Motion for Judgment on the Pleadings
May 28, 2020	Plaintiff's Reply

Thank you for Your Honor's attention to this matter.

Very truly yours,

/s/ Christopher J. Bowes Christopher J. Bowes, Esq

Cc: AUSA Joseph Pantoja

Application GRANTED. SO ORDERED.

Barbara Moses, U.S.M.J. December 17, 2019